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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-09-1261

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C. § 841)

RONALD SANON,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ANDREW KAPPAUF, being duly sworn, deposes and says that he is a Special Agent with U.S. Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about December 25, 2009, within the Eastern District of New York and elsewhere, the defendant RONALD SANON did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved five hundred grams or more of a substance containing cocaine, a Schedule II controlled substance.

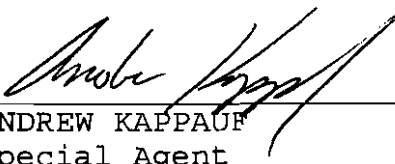
(Title 21, United States Code, Section 841(a)(1)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

1. On or about December 25, 2009, the defendant RONALD SANON arrived at JFK International Airport in Queens, New York aboard Jet Blue flight No. 824 from Santo Domingo, Dominican Republic. During a routine border enforcement examination, a U.S. Customs and Border Protection ("CBP") Officer observed that the defendant SANON was nervous during routine questioning. During the course of a pat-down examination, the CBP officer detected objects under the defendant SANON's clothing in the area of his lower abdomen. Further examination revealed that the defendant SANON was wearing spandex underwear containing four packages. After the packages were removed, the CBP officer probed each of them, revealing a white, powdery substance, which field-tested positive for cocaine. The total approximate gross weight of cocaine recovered from the packages was 1,105.4 grams.

WHEREFORE, your deponent respectfully requests that the defendants RONALD SANON be dealt with according to law.


 ANDREW KAPPAUF
 Special Agent
 U.S. Immigration and
 Customs Enforcement

Sworn to before me this
 26th day of December, 2009

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